



JUN 09 2015

Mr. Mike Kandris Pacific Ethanol Madera, LLC 400 Capital Mall, Suite 2060 Madera, CA 95814

Re: Notice of Minor Title V Permit Modification District Facility # C-4261 Project # C-1151316

Dear Mr. Kandris:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-4261-43-5 (under project C-1142739) into the Title V operating permit. Pacific Ethanol Madera LLC installed a new corn oil extraction system consisting of one 1,500 gallon solids tank, one 1,500 gallon stickwater tank, one 700 gallon corn oil surge feeder tank, one centrifuge, two 14,340 gallon reactor tanks, two 20,000 gallon corn oil loadout storage tanks, and a truck loadout system all served by the existing scrubber.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-4261-43-5, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet

Director of Permit Services

Enclosures

Gerardo C. Rios, EPA (w/enclosure) via email CC:

> Seyed Sadredin Executive Director/Air Pollution Control Officer

TITLE V APPLICATION REVIEW

Minor Modification Project #: C-1151316

Engineer: Andrea Ogden Date: June 8, 2015

Facility Number: C-4261

Facility Name: Pacific Ethanol Madera, LLC Mailing Address: 400 Capital Mall Suite 2060

Madera, CA 95814

Contact Name: Mike Kandris

Phone: (916) 403-2124

Responsible Official: Mike Kandris

Title: Chief Operating Officer

I. PROPOSAL

Pacific Ethanol Madera, LLC is proposing a Title V minor permit modification to incorporate recently issued C-4261-43-5 (under project C-1142739) into the Title V operating permit. Pacific Ethanol Madera is was issued an Authority to Construct (ATC) permit to install a new corn oil extraction system consisting of one 1,500 gallon solids tank, one 1,500 gallon stickwater tank, one 700 gallon corn oil surge feeder tank, one centrifuge, two 14,340 gallon reactor tanks, two 20,000 gallon corn oil loadout storage tanks, and a truck loadout system all served by the existing scrubber.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 31470 Avenue 12 in Madera, CA.

III. EQUIPMENT DESCRIPTION

C-4261-43-6: WET CAKE PROCESS CONSISTING OF ONE 135,600 GALLON WHOLE STILLAGE TANK, ONE CENTRIFUGE SYSTEM, ONE 100,000 GALLON THIN STILLAGE TANK, ONE EVAPORATOR, AND ONE 89,000 GALLON SYRUP TANK, CORN OIL EXTRACTION SYSTEM CONSISTING OF ONE 1,500 GALLON SOLIDS TANK, ONE 1,500 GALLON STICKWATER TANK, ONE 700 GALLON CORN OIL SURGE FEEDER TANK, ONE CENTRIFUGE, TWO 14,340 GALLON REACTOR TANKS, TWO 20,000 GALLON CORN OIL LOADOUT STORAGE TANKS, AND A TRUCK LOADOUT SYSTEM ALL SERVED BY AN APACHE STAINLESS "DISTILLATION" (AKA "PROCESS") WET SCRUBBER (SCRUBBER SHARED WITH PERMITS C-4261-36, '-38, '-41 AND '-42) AND MECHANICAL CONVEYORS

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, <u>Federally Mandated Operating Permits</u> (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Pacific Ethanol Madera is was issued an Authority to Construct (ATC) permit to install a new corn oil extraction system consisting of one 1,500 gallon solids tank, one 1,500 gallon stickwater tank, one 700 gallon corn oil surge feeder tank, one centrifuge, two 14,340 gallon reactor tanks, two 20,000 gallon corn oil loadout storage tanks, and a truck loadout system all served by the existing scrubber.

C-4261-43-6:

Permit conditions 1 and 2 on the current Authority to Construct were not included on the proposed Permit to Operate because they were administrative requirements and are not appliciable to an operating permit.

Permit condition 4 was added to the proposed Permit to Operate from condition 6 on the Authority to Construct to enforce the Daily Emission Limit (DEL) as required by District Rule 2201.

Permit condition 7 was added to the proposed Permit to Operate from condition 9 on the Authority to Construct to enforce the Daily Emission Limit (DEL) as required by District Rule 2201.

Permit condition 14 was added to the proposed Permit to Operate from condition 16 on the Authority to Construct to enforce the recordkeeping requirements of District Rule 2201.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

- 1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
- 2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
- 3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- 4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
- Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

- 1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- 2. The source's suggested draft permit; and

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-4261-43-6

EXPIRATION DATE: 11/30/2017

EQUIPMENT DESCRIPTION:

WET CAKE PROCESS CONSISTING OF ONE 135,600 GALLON WHOLE STILLAGE TANK, ONE ØÈNTRIFUGE SYSTEM, ONE 100,000 GALLON THIN STILLAGE TANK, ONE EVAPORATOR, AND ONE 89,000 GALLON SYRUP TANK, CORN OIL EXTRACTION SYSTEM CONSISTING OF ONE 1,500 GALLON SOLIDS TANK, ONE 1,500 GALLON STICKWATER TANK, ONE 700 GALLON CORN OIL SURGE FEEDER TANK, ONE CENTRIFUGE, TWO 14,340 GALLON REACTOR TANKS, TWO 20,000 GALLON CORN OIL LOADOUT STORAGE TANKS, AND A TRUCK LOADOUT SYSTEM ALL SERVED BY AN APACHE STAINLESS "DISTILLATION" (AKA "PROCESS") WET SCRUBBER (SCRUBBER SHARED WITH PERMITS C-4261-36, '-38, '-41 AND '-42) AND MECHANICAL CONVEYORS

PERMIT UNIT REQUIREMENTS

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- 3. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 125,000 gallon/day or 40,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The maximum throughput of corn oil loaded shall not exceed 7,200 gallons per day. [District Rule 2201]
- 5. All vapors from the wet cake process shall be vented through the "distillation" (aka "process") scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Controlled VOC emissions rate from the exhaust of the "distillation" (aka "process") scrubber serving the wet cake process, consisting of one whole stillage tank, one centrifuge, one thin stillage tank, one evaporator and one syrup tank, shall not exceed 0.1161 lb-VOC/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Controlled VOC emissions rate from the exhaust of the "distillation" (aka "process") scrubber while serving the slurry tank, distillation process, process condensate tank and wet cake process shall not exceed 0.1161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Fugitive VOC emissions from equipment leaks associated with the wet cake process shall not exceed 2.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC ETHANOL MADERA LLC Location: 31470 AVENUE 12, MADERA, CA 93637 C-4261-43-6: May 28 2015 7:52AM – OGDENA

- 12. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
- 13. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 14. The permittee shall maintain daily and annual records, in gallons, of the quantity of corn oil loaded at this facility [District Rule 2201]
- 15. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 16. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 17. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 18. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 19. This operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit C-4261-0. [District Rule 4455] Federally Enforceable Through Title V Permit
- 20. This operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit C-4261-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
- 21. The vent gas scrubber shall be equipped with a water flow meter, in operation at all times. [40 CFR 64] Federally Enforceable Through Title V Permit
- 22. The water flow rate through the vent gas scrubber shall not be less than 25 gal/minute. [40 CFR 64] Federally Enforceable Through Title V Permit
- 23. The permittee shall monitor and record the water flow rate through the vent gas scrubber at least once every day. [40 CFR 64] Federally Enforceable Through Title V Permit
- 24. The owner or operator shall submit excess emission reports for any excess emissions that occurred during the reporting period. [40 CFR 64] Federally Enforceable Through Title V Permit
- 25. If the water flow rate through the fermentation scrubber is less than 25 gal/minute, the permittee shall correct the water flow rate to exceed 25 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the fermentation scrubber continues to be less than 25 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR 64] Federally Enforceable Through Title V Permit
- 26. If the District or EPA determines that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64. [40 CFR 64] Federally Enforceable Through Title V Permit

PERMITUALT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC ETHANOL MADERA LLC Location: 31470 AVENUE 12, MADERA, CA 93637 C-4281-43-6; May 28 2015 7:52AM – OGDENA

27. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC ETHANOL MADERA LLC Location: 31470 AVENUE 12, MADERA, CA 93637 C-4261-43-6: May 28 2015 7:52AM – OGDENA

ATTACHMENT B

Authority to Construct





AUTHORITY TO CONSTRUCT

PERMIT NO: C-4261-43-5

ISSUANCE DATE: 01/13/2015

LEGAL OWNER OR OPERATOR: PACIFIC ETHANOL MADERA LLC **MAILING ADDRESS:**

400 CAPITOL MALL, SUITE 2060

SACRAMENTO, CA 95814

LOCATION:

31470 AVENUE 12 MADERA, CA 93637

EQUIPMENT DESCRIPTION:

MODIFICATION OF WET CAKE PROCESS CONSISTING OF ONE 135,600 GALLON WHOLE STILLAGE TANK, ONE CENTRIFUGE SYSTEM, ONE 100,000 GALLON THIN STILLAGE TANK, ONE EVAPORATOR, AND ONE 89,000 GALLON SYRUP TANK, ALL SERVED BY AN APACHE STAINLESS "DISTILLATION" (AKA "PROCESS") WET SCRUBBER (SCRUBBER SHARED WITH PERMITS C-4261-36, '-38, '-41 AND '-42) AND MECHANICAL CONVEYORS: INSTALLATION OF CORN OIL EXTRACTION SYSTEM CONSISTING OF ONE 1,500 GALLON SOLIDS TANK, ONE 1,500 GALLON STICKWATER TANK, ONE 700 GALLON CORN OIL SURGE FEEDER TANK, ONE CENTRIFUGE, TWO 14,340 GALLON REACTOR TANKS, TWO 20,000 GALLON CORN OIL LOADOUT STORAGE TANKS, AND A TRUCK LOADOUT SYSTEM ALL SERVED BY THE EXISTING SCRUBBER

CONDITIONS

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- Application C-4261-43-4 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 125,000 gallon/day or 40,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- The maximum throughput of corn oil loaded shall not exceed 7,200 gallons per day. [District Rule 2201] CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with ail laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud-Mariollet, Director of Permit Services

- 7. All vapors from the wet cake process shall be vented through the "distillation" (aka "process") scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Controlled VOC emissions rate from the exhaust of the "distillation" (aka "process") scrubber serving the wet cake process, consisting of one whole stillage tank, one centrifuge, one thin stillage tank, one evaporator and one syrup tank, shall not exceed 0.1161 lb-VOC/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
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- 13. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
- 14. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
- 15. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
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- 19. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
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- 21. This operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit C-4261-0. [District Rule 4455] Federally Enforceable Through Title V Permit
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- 28. If the District or EPA determines that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64. [40 CFR 64] Federally Enforceable Through Title V Permit
- 29. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	co	SOx	PM10
C-4261-43-5	0	0	0	0	0
TOTAL					

ATTACHMENT D

Application



[] ADMINISTRATIVE AMENDMENT

San Joaquin Valley Air Pollution Control District



www.valleyair.org

MAY 4 2015

Permit Application For:

[X] MINOR MODIFICATION

SJVUAPCD
[] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Pacific Eth	nanol Madera, LLC							
2. MAILING ADDRESS:								
STREET/P.O. BOX: 400 Capital Mall, Suit 2060								
CITY: Madera	STATE: CA		9-DIGIT ZIP CODE: 95814					
3. LOCATION WHERE THE EQUIPMENT WIL	INSTALLATION DATE:							
STREET: 31470 Avenue 12	CITY:	Madera	Projected 6/15/2015 —					
¼ SECTION TOWNSHII	RANC	GE						
4. GENERAL NATURE OF BUSINESS:								
Corn oil addition to an already existing ethan-	ol production facili	ity						
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Proposed ATC-4261-43-5 to modify C-4261-43-5 MODIFICATION OF WET CAKE PROCESS CONSISTING OF ONE 135,600 GALLON WHOLE STILLAGE TANK, ONE CENTRIFUGE SYSTEM, ONE 100,000 GALLON THIN STILLAGE TANK, ONE EVAPORATOR, AND ONE 89,000 GALLON SYRUP TANK, ALL SERVED BY AN APACHE STAINLESS "DISTILLATION" (AKA "PROCESS") WET SCRUBBER (SCRUBBER SHARED WITH PERMITS C-4261-36, '-38, '-41 AND '-42) AND MECHANICAL CONVEYORS: INSTALLATION OF CORN OIL EXTRACTION SYSTEM CONSISTING OF ONE 1,500 GALLON SOLIDS TANK, ONE 1,500 GALLON STICKWATER TANK, ONE 700 GALLON CORN OIL SURGE FEEDER TANK, ONE CENTRIFUGE, TWO 14,340 GALLON REACTOR TANKS, TWO 20,000 GALLON CORN OIL LOADOUT STORAGE TANKS, AND A TRUCK LOADOUT SYSTEM ALL SERVED BY THE EXISTING SCRUBBER								
			TITLE OF APPLICANT: Chief Operating Officer					
7. SIGNATURE OF APPLICANT: DATE:			PHONE: (916) 403-2124					
misekadus 5/4/2015 FAX: () EMAIL:								
For APCD Use Only:								
DATE STAMP	FILING FEE RECEIVED : _\$	6	CHECK#:					
	DATE PAID:							

7-1151310

FACILITY ID:





San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I.	TYPE OF PERMIT ACTION (Check ap)	propriate	box)						
[] [X]	SIGNIFICANT PERMIT MODIFICATION MINOR PERMIT MODIFICATION	[]	ADMINISTRATIVE AMENDMENT						
СО	MPANY NAME: Pacific Ethanol Madera, LLC			FACILITY ID: C - 4261					
1.	Type of Organization:[X] Corporation [] Sole (Ownership	[] Government []	Partnership [] Utility					
2.	Owner's Name: Pacific Ethanol Madera, LLC								
3.	Agent to the Owner: Mike Kandris								
II.	COMPLIANCE CERTIFICATION (Read each	statement	carefully and initial all	circles for confirmation):					
6	Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).								
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis								
	Corrected information will be provided to the information has been submitted.	Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.							
	Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.								
I de	eclare, under penalty of perjury under the laws of the	e state of	California, that the forgo	ing is correct and true:					
1	ribe Kondia		5/28/2	2015					
Sig	Signature of Responsible Official		Date						
	Mike Kandris								
Na	ume of Responsible Official (please print)								
3	Chief Operating Officer								
Tit	le of Responsible Official (please print)								

ATTACHMENT E

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-4261-43-4 EXPIRATION DATE: 11/30/2017

EQUIPMENT DESCRIPTION:

WET CAKE PROCESS CONSISTING OF ONE 135,600 GALLON WHOLE STILLAGE TANK, ONE CENTRIFUGE SYSTEM, ONE 100,000 GALLON THIN STILLAGE TANK, ONE EVAPORATOR, AND ONE 89,000 GALLON SYRUP TANK, ALL SERVED BY AN APACHE STAINLESS "DISTILLATION" (AKA "PROCESS") WET SCRUBBER (SCRUBBER SHARED WITH PERMITS C-4261-36, '-38, '-41 AND '-42) AND MECHANICAL CONVEYORS

PERMIT UNIT REQUIREMENTS

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- 3. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 125,000 gallon/day or 40,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. All vapors from the wet cake process shall be vented through the "distillation" (aka "process") scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Controlled VOC emissions rate from the exhaust of the "distillation" (aka "process") scrubber serving the wet cake process, consisting of one whole stillage tank, one centrifuge, one thin stillage tank, one evaporator and one syrup tank, shall not exceed 0.1161 lb-VOC/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Controlled VOC emissions rate from the exhaust of the "distillation" (aka "process") scrubber while serving the slurry tank, distillation process, process condensate tank and wet cake process shall not exceed 0.1161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Fugitive VOC emissions from equipment leaks associated with the wet cake process shall not exceed 2.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
- 10. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit

- 12. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 13. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 14. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 15. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 16. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
- 17. This operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit C-4261-0. [District Rule 4455] Federally Enforceable Through Title V Permit
- 18. This operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit C-4261-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
- 19. The vent gas scrubber shall be equipped with a water flow meter, in operation at all times. [40 CFR 64] Federally Enforceable Through Title V Permit
- 20. The water flow rate through the vent gas scrubber shall not be less than 25 gal/minute. [40 CFR 64] Federally Enforceable Through Title V Permit
- 21. The permittee shall monitor and record the water flow rate through the vent gas scrubber at least once every day. [40 CFR 64] Federally Enforceable Through Title V Permit
- 22. The owner or operator shall submit excess emission reports for any excess emissions that occurred during the reporting period. [40 CFR 64] Federally Enforceable Through Title V Permit
- 23. If the water flow rate through the fermentation scrubber is less than 25 gal/minute, the permittee shall correct the water flow rate to exceed 25 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the fermentation scrubber continues to be less than 25 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR 64] Federally Enforceable Through Title V Permit
- 24. If the District or EPA determines that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64. [40 CFR 64] Federally Enforceable Through Title V Permit
- 25. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit